UNITED STATES DISTRICT COURT		U.S. DISTRICT COURT DISTRICT OF VERMONT FILED
FOR THE DISTRIC		2015 MAY 15 AM 8: 46
UNITED STATES OF AMERICA)	CLERK
v.)) Crim. N	BY GUERKS Jo. 5:15-cr-02PUTY CLERKS
EDWARD GRIMES, Defendant.)) filed)	UNDER SEAL

GOVERNMENT' MOTION TO REVOKE DEFENDANT'S RELEASE ORDER

The United States of America, by and through its attorney, Eugenia A.P. Cowles, United States Attorney for the District of Vermont, hereby requests, pursuant to 18 U.S.C. § 3148, that this Court issue a warrant for the arrest of defendant Edward Grimes based upon the defendant's violations of conditions of release, schedule a violation hearing to address those violations, and revoke the defendant's release order. The basis for the government's motion is the Violation Report on Offender Under Pretrial Supervision ("Violation Report"), dated today prepared by U.S. Probation Officer Nathan Rosato.

Grimes was released on conditions to abide by the conditions of a residential treatment program in order to address his substance abuse. As the Violation Report explains, he has failed to abide by this condition.

Based on the facts set forth in the violation report, there is clear and convincing evidence that the defendant has violated his conditions of release., and there may be probable cause to believe that the defendant has committed a Federal, State, or local crime. See 18 U.S.C. § 3148(b)(1)(A)-(B).

Accordingly, the government requests that the Court grant this motion, issue an arrest warrant, and hold a hearing on this matter at which Grimes release on conditions should be revoked.

Dated at Burlington, in the District of Vermont, this 15th day of May, 2015.

Respectfully submitted, UNITED STATES OF AMERICA EUGENIA A.P. COWLES

United States Attorney-

By:

MICHAEL P. DRESCHER Assistant U.S. Attorney 11 Elmwood Ave., PO Box 570 Burlington, VT 05401 michael.drescher@usdoj.gov